

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 1:22-CV-21150-RNS

RHONDA COOPER,

Plaintiff,

v.

BURGER KING CORPORATION,

Defendant.

JOINT MOTION FOR EXTENSION OF TIME

Plaintiff Rhonda Cooper and Defendant Burger King Corporation (“Burger King”) (together, the “Parties”), by and through their undersigned counsel, hereby respectfully move the Court to stay Burger King’s deadline to move to dismiss or otherwise respond to the Complaint (Dkt. 1) in this action, without waiving any objection or defense, in order to facilitate the filing of a consolidated complaint.

1. Plaintiff Rhonda Cooper filed the Complaint in this action on April 14, 2022.
2. Azman Hussain filed a similar complaint in *Hussain v. Burger King Corporation*, No. 4:22-cv-02258 in the Northern District of California on April 11, 2022.
3. This Court granted Burger King’s prior Unopposed Motion for Extension of Time on May 10, 2022, extending Burger King’s deadline to answer or otherwise respond to the Complaint until May 31, 2022.
4. Since then, counsel for Rhonda Cooper and Azman Hussain have discussed combining their cases into a single action in this Court by filing a voluntary dismissal of the *Hussain* action and filing an amended consolidated complaint in this action.

5. The Parties wish to promote judicial efficiency by avoiding unnecessary and wasteful motion practice with respect to the current complaint, which will be superseded by the forthcoming consolidated amended complaint.

6. Accordingly, the Parties respectfully request the Court stay Burger King's deadline to move to dismiss or otherwise respond to the Complaint.

7. The Parties are discussing a deadline for the filing of a consolidated complaint and a briefing schedule for Burger King's anticipated motion to dismiss. The Parties will propose a schedule within fourteen days of the Court's order.

Certificate of Compliance with Local Rule 7.1(a)(3)

Pursuant to Local Rule 7.1(a)(3), counsel for both Parties conferred on May 25, 2022 and agree to the relief as set forth herein.

Dated: May 26, 2022

/s/ Daniel D. Dolan
Steffan Keeton (*pro hac vice*)
stkeeton@keetonfirm.com
The Keeton Firm LLC
100 S. Commons, Suite 102
Pittsburgh, PA 15212
Telephone: (888) 412-5291

Daniel D. Dolan, II, Esq. (Fla Bar No. 84913)
Florida Bar No.: 84913
Dolan Dobrinsky Rosenblum Bluestein LLP
2665 South Bayshore Drive, Suite 603
Miami, Florida 33133
Telephone: (305) 371-2692
Facsimile: (305) 371-2691
Email: DDolan@DDRLawyers.Com

Attorneys for Rhonda Cooper

Respectfully submitted,

/s/ Edward Soto
Edward Soto (Fla. Bar No. 0265144)
edward.soto@weil.com
Pravin R. Patel (Fla. Bar No. 0099939)
pravin.patel@weil.com
Brian G. Liegel (Fla. Bar No. 119269)
brian.liegel@weil.com
WEIL GOTSHAL & MANGES LLP
1395 Brickell Avenue, Suite 1200
Miami, FL 33131
Telephone: (305) 577-3100
Facsimile: (305) 374-7159

David R. Singh (*pro hac vice forthcoming*)
david.singh@weil.com
WEIL GOTSHAL & MANGES LLP
201 Redwood Shores Parkway, 6th floor
Redwood Shores, CA 94605-1134
Telephone: (650) 802-3000
Facsimile: (650) 802-3100

Diane Sullivan (*pro hac vice forthcoming*)
diane.sullivan@weil.com
WEI, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, NY 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

Attorneys for Burger King Corporation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 26, 2022, I caused the foregoing to be electronically filed with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Edward Soto

Edward Soto (Fla. Bar No. 0265144)
WEIL GOTSHAL & MANGES LLP
1395 Brickell Avenue, Suite 1200
Miami, FL 33131
Telephone: (305) 577-3100
Facsimile: (305) 374-7159

Attorney for Burger King Corporation